

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA,	:	
	:	17-cr-0047-DLC
v.	:	
	:	
MAHMOUD THIAM,	:	
	:	
Defendant.	:	
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**DECLARATION OF PAUL E. SUMMIT IN SUPPORT OF
MAHMOUD THIAM'S MOTION FOR PRETRIAL RELEASE**

Paul E. Summit, pursuant to 28 U.S.C. § 1746, declares:

1. I am a member of the New York State Bar, admitted to practice to this Court, and a partner at Sullivan & Worcester LLP, attorneys for the defendant Mahmoud Thiam in this case.
2. I submit this declaration in support of Mr. Thiam's motion for a set of reasonable bail conditions leading to his pretrial release from custody.
3. Attached as Exhibit 1 is a true and correct copy of the Complaint, dated December 12, 2016.
4. Attached as Exhibit 2 is a true and correct copy of the Indictment, dated January 18, 2017.
5. Attached as Exhibit 3 is a true and correct copy of the transcript from the December 13, 2016 hearing before Magistrate Judge Francis.
6. Attached as Exhibit 4 is a true and accurate copy of the March 19, 2015 Wall Street Journal article, entitled "U.S. Probe Into Guinea Mining Rights Could Yield Six Indictments."
7. Attached as Exhibit 5 are true and correct copies of many of Mr. Thiam's bank

account closing statements.

8. Attached as Exhibit 6 is a true and accurate copy of the deed to 771 Duell Road, Stanford, New York.

9. Attached as Exhibit 7 is a true and correct copy of a letter from Human Rights Watch to President Conde, dated October 4, 2016.

10. Attached as Exhibit 8 are emails dated November 9 and 11, 2016 between Mahmoud Thiam and Eric Wei, attorney for Mr. Thiam's landlord, related to Mr. Thiam's unpaid rent on his New York City apartment.

11. Attached as Exhibit 9 are true and correct copies of tuition bills for the Dalton School and the Horace Mann School, and an email dated January 11, 2017 from Tom Kelly, Head of School for Horace Mann School to Fatim Thiam regarding tuition payments for Horace Mann.

12. Attached as Exhibit 10 is a true and correct copy of Mr. Thiam's settlement agreement with the IRS dated September 30, 2014 and an Annual Installment Agreement Statement dated September 1, 2016.

13. Attached as Exhibit 11 is a true and correct copy of a Consolidated Statement of Tax Liabilities from the New York State Department of Taxation and Finance dated May 16, 2016.

Dated: New York, New York
January 23, 2017

/s/ Paul E Summit
Paul E Summit